

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Case No. 7:23-cv-04832

People of the State of New York, by LETITIA JAMES,  
Attorney General of the State of New York,

Plaintiff,

-against-

RED ROSE RESCUE, CHRISTOPHER MOSCINSKI,  
MATTHEW CONNOLLY, WILLIAM GOODMAN, LAURA  
GIES, JOHN HINSHAW, AND JOHN AND JANE DOES, the  
last two named being fictitious names, the real names of such  
persons being currently unknown but who are active in Red  
Rose Rescue or act in concert with the above-named individuals  
or organization to engage in, or who will engage in, the conduct  
complained of herein,

Defendants.

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DECLARATION OF  
SANDRA PULLMAN IN  
SUPPORT OF  
PLAINTIFF'S MOTION  
FOR CONTEMPT

I, SANDRA E. PULLMAN, an attorney admitted to practice before this Court, declare the  
following to be true under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am Senior Counsel in the Civil Rights Bureau of the Office of the Attorney  
General for the State of New York ("OAG") located at 28 Liberty, New York, NY 10005, which  
represents the State of New York in this action. I am familiar with the matters set forth herein,  
either from personal knowledge or on the basis of documents that have been provided and reviewed  
by me.

2. I respectfully submit this Declaration in support of Plaintiff's Motion for Contempt  
seeking to find Defendant Red Rose Rescue in violation of the Court's Order granting Preliminary  
Injunction dated December 15, 2023. (Dkt. No. 62).

3. All of the attached materials are true and correct copies as described and specified below.

<b>Exhibit List</b>	
<b>Exhibit A</b>	Bernadette Patel, <i>The witness of Red Rose Rescuers Fr. Fidelis Moscinski and Laura Gies</i> , THE CATHOLIC WORLD REPORT (July 1, 2023), <a href="https://www.catholicworldreport.com/2023/07/01/the-witness-of-red-rose-rescuers-fr-fidelis-moscinski-and-laura-gies/">https://www.catholicworldreport.com/2023/07/01/the-witness-of-red-rose-rescuers-fr-fidelis-moscinski-and-laura-gies/</a> .
<b>Exhibit B</b>	Ronald Lyman Affidavit
<b>Exhibit C</b>	<i>Pro-Life Future</i> , STUDENTS FOR LIFE OF AMERICA, <a href="https://www.prolifefuture.org/newyork/">https://www.prolifefuture.org/newyork/</a> (last visited Aug. 21, 2024).
<b>Exhibit D</b>	Bernadette Patel, <i>New York Is Waging Radical Pro-Abortion Lawfare On Peaceful Pro-Lifers</i> , THE FEDERALIST (July 27, 2023), <a href="https://thefederalist.com/2023/07/27/new-york-is-waging-radical-pro-abortion-lawfare-on-peaceful-pro-lifers/">https://thefederalist.com/2023/07/27/new-york-is-waging-radical-pro-abortion-lawfare-on-peaceful-pro-lifers/</a> .
<b>Exhibit E</b>	Tyler Arnold, <i>New York Attorney General Sues Pro-Life Group</i> , CATHOLIC NEWS AGENCY (June 13, 2023), <a href="https://www.catholicnewsagency.com/news/254564/new-york-attorney-general-sues-pro-life-group">https://www.catholicnewsagency.com/news/254564/new-york-attorney-general-sues-pro-life-group</a> .
<b>Exhibit F</b>	Complaint, Monica Miller et. al v. Letitia James 23-CV-0820.
<b>Exhibit G</b>	Talia Jane, <i>Meet Brianna Mangat, aka “Bernadette Patel,” aka “Jane Doe”</i> , X (Dec. 9, 2023), <a href="https://x.com/taliaotg/status/1733527845610156232">https://x.com/taliaotg/status/1733527845610156232</a> .
<b>Exhibit H</b>	Excerpt of Security Camera footage, admitted at the White Plains trespass trial as <i>People’s Exhibit 8</i> . (minutes 48–66).
<b>Exhibit I</b>	Photograph of Bernadette Patel in front of the Planned Parenthood facility at Bleecker St, Manhattan, NY (Jan. 6, 2024).
<b>Exhibit J</b>	Oscar A. Garcia, <i>Hoy sábado 6 de enero primer sábado del mes y del año</i> , INSTAGRAM (Jan. 6, 2024), <a href="https://www.instagram.com/p/C1xY6Oovkcl/?img_index=6">https://www.instagram.com/p/C1xY6Oovkcl/?img_index=6</a> .
<b>Exhibit K</b>	Photograph of Bernadette Patel in front of the Planned Parenthood facility at Bleecker St, Manhattan, NY (Aug. 15, 2024).
<b>Exhibit L</b>	Oscar A. Garcia, <i>Porque rezar por el fin del aborto?</i> , INSTAGRAM (Jan. 13, 2024), <a href="https://www.instagram.com/p/C2DWRbVPu7F/?img_index=1">https://www.instagram.com/p/C2DWRbVPu7F/?img_index=1</a> .
<b>Exhibit M</b>	Bill Miller, <i>Witness for Life Team Continues Reciting Pro-Life Rosary in Brooklyn</i> , THE TABLET (Jan. 17, 2024), <a href="https://thetablet.org/witness-for-life-team-continues-reciting-pro-life-rosary-in-brooklyn/">https://thetablet.org/witness-for-life-team-continues-reciting-pro-life-rosary-in-brooklyn/</a> .
<b>Exhibit N</b>	Photograph of Bernadette Patel in front of the Planned Parenthood facility at Court Street in Brooklyn, NY (Aug. 10, 2024).
<b>Exhibit O</b>	Jeffrey Bruno, <i>Love, simply Love – Witness for Life – Brooklyn, NY.</i> , INSTAGRAM (Aug. 10, 2024), <a href="https://www.instagram.com/p/C-gQdHIP2V_/?img_index=5">https://www.instagram.com/p/C-gQdHIP2V_/?img_index=5</a> .
<b>Exhibit P</b>	Savannah Craven, <i>Thank you to everyone who came out for National Sidewalk Day in Brooklyn!</i> , INSTAGRAM (Aug. 10, 2024), <a href="https://www.instagram.com/p/C-fpks0xryg/">https://www.instagram.com/p/C-fpks0xryg/</a> .

<b>Exhibit Q</b>	<i>Get Involved</i> , RED ROSE RESCUE, <a href="https://www.redroserescue.com/get-involved">https://www.redroserescue.com/get-involved</a> (last visited Aug. 15, 2024).
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4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York

August 27, 2024

By: /s/ Sandra Pullman  
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New York State Attorney General  
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